



DECLARATION OF SENELISE CONSTANT

1. My name is Senelise Constant. I am over the age of 18 years, otherwise competent to give sworn testimony, and I have personal knowledge of the matters set forth in this Declaration.
2. I began my employment with A Place for Children, Inc. in October 2013. I was employed as an infant caregiver and my primary duties were to supervise and care for the infant children. I was earning a wage of \$9.00 per hour.
3. I am a “non-exempt” employee pursuant the Fair Labor Standards Act and thus entitled to overtime pay.
4. During the later part of 2015, I began to work approximately 60 hours per week. I was paid straight time at \$9.00 per hour. However, I should have been receiving \$13.50 per hour for each overtime hour worked.
5. For approximately 16 weeks, I worked 60 hours each week. I was paid straight time of \$9.00 per hour. I filed a lawsuit in hopes of receiving the overtime pay due to me.
6. I am owed \$1,440.00 in overtime pay (16 weeks * 20 hours * \$4.50) and \$1,440.00 in statutory liquidated damages.

7. To my knowledge, my lawsuit was filed on September 23, 2015 and A Place for Children, Inc. was served by summons on October 15, 2015. To date, Defendant has failed to plead a defensive or otherwise defend.
8. I declare under penalty of perjury that the foregoing is true and correct.”

Date: December 15, 2016

Signature: Senelise Constant
Senelise Constant